

Lewis County Career and Technical Education Cooperative, Washington State

September 9, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Modernizing the E-Rate Program for Schools and Libraries, WC Docket 13-184

Dear Ms. Dortch,

The Lewis County CTE Cooperative consists of 8 rural school districts in Lewis County, Washington State, who work towards improving Career and Technical Education for our students in both career and Core Educational requirements, most all of whom are also Basic Education Students. The coop works on E-Rate applications for all the districts to make sure that they are able to benefit from the program by working at obtaining high speed connectivity, technology learning access within buildings for all students and cost savings that allow for limited funds to be spread throughout the learning process. The districts serve about 4800 students.

This letter offers comments related to the FCC's effort to modernize the E-rate program.

We believe:

- Universal access to broadband is necessary to meet school reform and improvement goals. These goals include the development of K-12 programming able to prepare all students for college and 21st century careers.
- The demand for access to broadband is growing rapidly beyond the ability of schools to provide it, despite the cost advantage possible through the E-rate discount.
- A modernized E-rate program must be less burdensome for schools, and aligned more effectively to current and future K-12 education priorities.
- Today's demand for the cost benefit of the E-rate program exceeds available funding. Clearly, the amount of money available for schools must meet state and local needs.

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Several areas of streamlining that are also needed include the PIA process in which attachment 21's are required and then in most cases the PIA asks for the complete vendor statement. This causes much time loss from the schools to print this off and send in along with phone call tag that seems to be the norm.

Another area is multiple entries required for each of the applications that could be reduced by just using the Entity number and Spin number as these are on file within the system.

In the area of category two funding something needs to be done to increase the chances that rural schools who have only a few buildings are able to reach the threshold that other larger districts with areas of higher poverty are able to obtain funding twice in every 5 years while rural ones go without an even chance due to the free lunch counting system. Either restricting districts to fewer awards every 5 years or developing rural set asides that recognize both the size and funding match requirements faced by the rural school would be beneficial.

We agree that it is time to modernize the E-rate program and support positive change that benefits K-12 schools while still keeping it available at the local level and not forcing rural school to not be able to obtain reduced costs services that might be available by pooling in larger metropolitan areas. We encourage you to move quickly as you complete your deliberations.

If you have any further questions about our district, please do not hesitate to contact me at 360-978-4049 or bkraig@hughes.net.

Sincerely,

Dr. Robert Kraig
Lewis County Coop Director